

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

JOON BANG, RAZVAN VICTOR  
BENGULESCU, GERALD BEZEMS,  
SCOTT CROCKETT, FIFAT GORENER,  
CHRISTOPHER LESIEUR, LAWRENCE  
MARCUS, and MIKHAIL  
SULEYMANOV, individually and on  
behalf of others similarly situated,

Plaintiffs,

vs.

BMW OF NORTH AMERICA, LLC,  
BAVARIAN MOTOR WORKS, and  
DOES 1 through 10, inclusive,

Defendants.

No. 2:15-cv-6945 (MCA)(LDW)

**CLASS ACTION**

**JURY TRIAL DEMANDED**

**[PROPOSED ORDER] GRANTING PLAINTIFFS' UNOPPOSED MOTION  
FOR ATTORNEYS' FEES, EXPENSES, AND INCENTIVE AWARDS**

**WHEREAS**, Plaintiffs and Defendants executed an agreement to settle this matter, subject to Court approval, on April 11, 2018;

**WHEREAS**, the Court reviewed the parties' Settlement Agreement and issued an order granting preliminary approval to it on May 11, 2018 (ECF No. 88);

**WHEREAS**, Section VIII(B) of the Settlement Agreement provides that Defendants have agreed to pay, subject to Court approval, the amount of up to \$3,022,000 to Plaintiff's counsel for their attorneys' fees and expenses;

**WHEREAS**, Section VIII(C) of the Settlement Agreement provides that Defendants have agreed to pay, subject to Court approval, incentive awards totaling \$3,500 to each of the eight Class Representatives (\$28,000 total);


**WHEREAS**, after considering Plaintiffs' motion, memorandum of law and supporting materials (including declarations from counsel) as well as any material(s) that may be filed in opposition thereto, the Court having concluded that Plaintiffs' request for fees, expenses, and the payment of incentive awards is reasonable, permissible under the applicable law, and in accordance with the Settlement Agreement.

**IT IS ORDERED AS FOLLOWS:**

1. Plaintiffs' Unopposed Motion for Attorneys' Fees, Expenses, and Incentive Awards is **GRANTED**.
2. Defendants shall pay Plaintiffs' counsel \$ 3,022,000 for their attorneys' fees and expenses, in accordance with the Settlement Agreement.
3. Defendants shall also make an additional payment totaling \$ 28,000 to Plaintiffs' counsel for the incentive awards of the eight Class Representatives, which amounts shall then be remitted by Plaintiffs' counsel to the Class Representatives, in accordance with the Settlement Agreement.
4. All other payments and costs shall be borne as set forth in the Settlement Agreement or as agreed to by the parties.

**IT IS SO ORDERED.**

Dated: Sept 10-18

  
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Hon. Madeline C. Arleo  
United States District Judge